

EU Action Plan Towards a Zero Pollution Ambition for air, water and soil

FEAD, the European Federation for Waste Management and Environmental Services, representing the private waste and resource management industry across Europe **welcomes** the EU Action Plan Towards a Zero Pollution Ambition for air, water and soil which aims at securing clean air, water and soil, healthy ecosystems and a healthy living environment for Europeans.

From a waste management perspective, in order to secure a safer environment, we would like to stress the following needs of the waste management sector:

- **More information**

When treating waste, the operators may face a lack of information about the composition of the waste received. This is particularly critical for hazardous waste. Such information is essential for several reasons: compliance with the acceptance criteria in the facilities and, where applicable, the compliance with legislative requirements such as POP Regulation or Seveso requirements on site, verification of the chemical compatibility to prevent any risk of accident and protection of employees and citizens in terms of health and safety.

- **Need for guidance**

Together with the need for more information we call for the creation of a realistic guidance on what could be found in different waste streams and how to treat them in a safe and environmentally sound manner

- **Get rid of Substances of Very High Concern**

This topic is fundamental and in order to improve the quality of recyclates as well as the safety of the workers and the environment we should, as much as possible, get rid of substances of very high concern in the products. If substitutes are unavoidable we then claim for more information on products and on how to remove and treat those substances in a safe and environmentally sound manner.

- **Mandatory eco-design**

We call for a true dismantlability and recyclability of products through mandatory standards for designing products, phasing out substances of very high concern and POPs. A robust eco-design policy will be also a key tool for the prevention of the generation of waste.

- **Enforcement and implementation of EU legislation**

While ambitious targets push for more recycling in terms of quantity, a qualitative approach is also needed, as recyclers are investing in downstream parts of the value chain. This investment will only be made

possible by the proper implementation and enforcement of the existing international and European legislation (REACH, RoHS, POPs) at all stages and by all actors, with a specific attention to imported goods.

- **Legacy substances**

Because legacy substances are a barrier to recycling we call for a specific decision-making methodology to support decisions on the decontamination and the recyclability of waste containing substances of concern.

- **Incentives should be provided for specific decontamination** in view of recycling. As already mentioned, information regarding the presence of substances of concern is missing in most cases, thus there is no sufficient market for innovation and investment in dedicated recycling facilities. **Public support should be considered to foster new investments related to separation and decontamination**, allowing for more recycling.

- **Consumers' information**

Information to consumers related to products' environmental footprint, to products' recycled content, to correct disposal and effective recycling, are measures aiming at empowering the consumers and making them attentive to pollution impacts.

- **New pieces of legislation for products could lead to:**

- a better knowledge of the products' contents
- a better segregation between uncontaminated parts and contaminated parts
- the production of risk free recyclates and a strong European secondary raw material market
- a certain increase of the contaminated plastic waste fractions to be disposed of and therefore a decrease in recycling rates
- an increase in recyclates prices.

In order to improve the protection of human health and the environment from the risks that can be posed by pollution, the Commission needs to strike the right balance between the economical and the environmental sustainability of the products which we acknowledge to be one of the most challenging issues nowadays.